

LaMONICA HERBST & MANISCALCO, LLP

Proposed Counsel to Marianne T. O'Toole, Successor Trustee

3305 Jerusalem Avenue, Suite 201

Wantagh, New York 11793

Telephone: (516) 826-6500

Holly R. Holecek, Esq.

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF NEW YORK

-----X

In re:

Case No.: 24-10157-1-REL

KRIS DANIEL ROGLIERI,

Chapter 7

Debtor.

-----X

**STATEMENT RESPECTING CHAPTER 11 CASE OF
PRIME CAPITAL VENTURES, LLC**

Marianne T. O'Toole, solely in her capacity as the successor Chapter 7 Trustee ("Successor Trustee") of the estate of Kris Daniel Roglieri ("Debtor"), by her undersigned proposed counsel, submits this statement in connection with the status hearing scheduled for June 11, 2025, and respectfully represents as follows:

1. Prior to the appointment of the Successor Trustee, the prior Chapter 7 Trustee for the Debtor's estate ("Prior Trustee") filed a voluntary Chapter 11 petition on behalf of the Debtor's solely-owned company, Prime Capital Ventures, LLC ("Prime") in this Court. See generally Case No.: 24-11029-1-rel.

2. By Order entered on May 6, 2025, the Court directed Prime, by and through the Prior Trustee, to show cause why a trustee should not be appointed for Prime pursuant to 11 U.S.C. § 1104. See Case No.: 24-11029-1-rel, ECF No. 233.

3. On May 27, 2025, Marianne T. O'Toole was appointed pursuant to 11 U.S.C. § 703(a) as successor interim trustee in this case. See ECF No. 491.

4. By Order entered on June 2, 2025, the Court scheduled a hearing to address the management of Prime. See ECF No. 500.

5. The Successor Trustee hereby consents to the appointment of a Chapter 11 Trustee for Prime pursuant to 11 U.S.C. § 1104.

Dated: June 3, 2025

Wantagh, New York

LaMONICA HERBST & MANISCALCO, LLP
Proposed Counsel to Marianne T. O'Toole,
Successor Trustee

By: s/ Holly R. Holecek
Holly R. Holecek, Esq.
A Partner of the Firm
3305 Jerusalem Avenue, Ste. 201
Wantagh, New York 11793
Telephone: (516) 826-6500